

EXHIBIT 2

2 Broadway
New York, NY 10004

Demetrius Crichlow
President



New York City Transit

July 16, 2025

Mr. Joe DeLorenzo
Associate Administrator for Transit Safety and Oversight and Chief Safety Officer
Federal Transit Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Dear Mr. DeLorenzo:

I am happy to provide the information requested in your July 7 letter to supplement the response transmitted on March 30, 2025. Below are updates that further demonstrate our commitment to safety, followed by the additional detail requested:

- ***Crime in the New York City Transit (NYCT) system is lower than pre-pandemic levels and has remained down year-over-year.*** On July 1, the New York City Police Department (NYPD), the agency responsible for policing the NYCT system and reporting on transit crime, [announced that transit crime declined](#) by 3% year-to-date over the same period last year. This marks a 5% decrease over the last two years and an 8% decrease versus 2019. NYPD reports that transit crime remains less than 2% of citywide crime.
- ***The downward trend is the direct result of commitments by the Governor of New York, the Mayor of the City of New York, and the NYPD Police Commissioner to increase the presence of law enforcement throughout the NYCT system.*** That includes allocating millions of dollars to deploy 1,000 members of the National Guard, surge more NYPD officers in the system – including reassignments from administrative duties to patrol, and the continued commitment from the Governor to fund two uniformed officers per train on 150 subway trains each night from 9pm to 5am.
- ***Customers are demonstrating their faith in the transit system, setting post-pandemic ridership records, as NYCT delivers more and better service.*** NYCT subways and buses carried more than 2 billion riders in 2024 and registered more than the next 42 largest transit agencies combined¹. NYCT surpassed 106 million rides last month, up 10% over the same time last year, with new post-pandemic records for daily ridership. In June, subways also registered the highest on-time performance in modern record-keeping outside of the pandemic, while customer satisfaction rose by 8% on subways and 11% on buses.
- ***Our customers feel safer on transit.*** Our latest monthly Customer Pulse Survey demonstrated a 10 percentage point increase from January to May in customers reporting they feel safe in the subway system, up to the highest level in the last year (from 65% to 75%). We are continuing our work to build on that momentum.

¹ Based on the latest available full-year NTD data (2023).

- ***In addition to more enforcement, we are continuing our work to invest in system safety and security.*** NYCT continues to install platform edge barriers, which prevent customers from falling onto the tracks, now in place at over 50 stations and on pace to meet our commitment of 100 stations by the end of the year. Our riders appreciate the investment. In recent surveys, a majority of respondents stated the barriers make them feel safer, will protect against falls onto the tracks, and want them installed at more stations. NYCT is on track to install LED lighting in all 472 stations by 2026, with 72% of stations already complete.
- ***NYCT is leveraging cameras and technology to make the system safer for riders and employees.*** As we noted in our March 30 response, NYCT has more than 100,000 cameras across the NYCT system, including in every subway car. Cameras are 98-99% operational on average. At the [April 2025 meeting of the MTA Board's Safety Committee](#), MTA Chief of Security Michael Kemper delivered a presentation that included an overview of the camera network, how video is used to support law enforcement, and new initiatives that explore how to use AI and innovative technology to enhance the security of the system.
- ***More officers deployed in the system has resulted in more enforcement actions, which are a driver of the rise in felony assaults.*** As highlighted in the [March 2025 presentation](#) to the MTA Board and discussed in our previous response, the increase in felony assaults is in large part due to the disturbing pattern of increased assaults on uniformed officers, who have a greater presence in the system and are actively enforcing fare evasion, quality of life, and other crimes. According to the NYPD, felony assaults on law enforcement in the transit system are up 84% in the first half of 2025 compared to 2019, although other major crime categories, such as robbery and grand larceny are down. The MTA continues to work with partners across government to address this disconcerting trend and to better protect people throughout the system.
- ***Total assaults are down in 2025.*** The Transportation Secretary incorrectly stated overall crime is up and points to the increase in felony assaults in the NYCT system. However, this is an incomplete and inaccurate picture. In recent years, the MTA and others have advocated to strengthen protections for our workers and others, and to have misdemeanor assaults recategorized as felony assaults so that these crimes can be prosecuted to the fullest extent. Including misdemeanor assaults, which represent the majority of total assaults, NYPD crime data from January 1 through July 13 (this past Sunday) indicate total assaults are down 1.7% compared to the same period in 2024, and down 3.5% compared to 2023.
- ***Assaults on NYCT workers are now at the lowest level in the last six years.*** Assaults on NYCT workers in the first five months of 2025 are the lowest in the last six years, down 65% over the same period last year and down 44% compared to 2019². More broadly, total incidents of workplace violence, which include harassment and other acts of aggression against NYCT workers, is down 50% compared to the first five months of last year and down 58% compared to 2019. Though this is a trend in the right direction, the MTA, NYCT, the MTA's Criminal Justice Advocate, and other partners in government continue to invest in and fight for better protection for our workers.
- ***The MTA operates one of the safest transit systems in America.*** As noted in our March 30 response, FTA NTD data show that transit riders in Minneapolis and Dallas are 13 times more likely per trip to be the victim of an assault than NYCT riders – with Minneapolis and Dallas averaging more than 3 customer assaults per million trips versus NYCT's 0.25 per million trips. NYCT ranks among the safest urban transit systems, with Chicago and Houston transit riders 8

² Transit worker assaults reported in accordance with New York State Penal Law

https://data.ny.gov/Transportation/MTA-Workplace-Violence-Penal-Law-Incidents-Beginni/2xh4-m2qk/about_data

times more likely, San Diego transit riders 7 times more likely, Los Angeles riders 6 times more likely, and Washington, D.C. riders 3 times more likely than NYCT riders to be victims of assaults on a per trip basis. At your request, we have included the methodology for using FTA NTD data to calculate customer assaults per million trips in Section II.2 of the attached response. We continue to communicate with other transit agencies to share actions, information, and lessons learned on our efforts to promote customer and employee safety.

- **MTA agencies have been named national leaders in transit safety and security.** In early July, the NYCT, MTA Long Island Rail Road, MTA Metro-North Railroad each [received top awards](#) in security, emergency preparedness, and worker safety from the American Public Transportation Association.
- **NYCT is committed to timely FTA reporting and regulatory compliance.** I was surprised by the assertion about the extent of lateness for NYCT's NTD reporting. Working with NYCT's NTD validation analyst as recommended in your letter, we determined that the submission date listed in the database reflects the last date an event record was accessed and/or modified, rather than the date it was originally submitted. With this information, we were able to replicate the calculations in your letter. Event records are often modified following the original submission as more detail becomes available, and records are sometimes modified at FTA's request. At the recommendation of our NTD analyst, we have submitted a formal request to obtain the date of original submission, which is not readily available in the system, to better understand the timeliness of our submissions and how NYCT might continue to improve its reporting processes.

Thank you for the opportunity to share more about the MTA's ongoing efforts to improve the safety of our system for our workers and riders. Please find more detailed information in response to the items requested in your letter on the following pages.

Sincerely,



Demetrius Crichlow

cc: Michael Culotta, FTA Region 2 Administrator
 Matt Welbes, FTA Executive Director
 Suzanne TeBeau-Rohde, FTA Chief Counsel
 Melissa Newton, FTA Director, Government and Legislative Affairs
 Janno Lieber, MTA Chairman and CEO
 Michael Kemper, MTA Chief Security Officer
 Carl Hamann, MTA Acting Chief Safety Officer
 Jessica Tisch, NYPD Commissioner
 Joseph Gulotta, Chief, NYPD Transit Bureau

NYCT Safety and Security

Responses to July 7 Letter

I. Additional information on performance measures used to evaluate the effectiveness of planned and ongoing NYCT mitigation efforts

1. Criteria for Selecting Mitigations to Reduce Safety Risk

As set forth in NYCT's Public Transportation Agency Safety Plan (PTASP), NYCT has implemented a comprehensive safety management system, which includes a systematic approach to identifying potential safety hazards and assessing, prioritizing, and mitigating the associated safety risks.

Potential hazards are identified in multiple ways, such as through ongoing safety data analyses, internal reviews, findings from inspections, audits, investigations, labor-management discussions, or other observations. The associated safety risks are categorized and prioritized based on the combination of their potential severity if they occur (from catastrophic to negligible) and the probability of occurrence (from frequent to improbable).

To address the identified risks, NYCT determines the appropriate specific actions (mitigations) by drawing on the agency's experience and knowledge of its operations, assets, and resources, as well as by benchmarking with peers. NYCT evaluates potential mitigations, including possible negative impacts of the mitigations, with the objective of maximizing the probability of risk reduction while ensuring that mitigations can be implemented within current constraints. For example, key considerations include:

- The expected ability of the mitigation to prevent recurrence, minimize severity, and/or minimize frequency of the identified risk in order to maximize safety for the greatest number of stakeholders, including customers, employees, and the public.
- Technical, operational, and fiscal feasibility of the mitigation, including compatibility with equipment, infrastructure, and the operating environment, availability of technology, staffing and training implications, and budgetary and other constraints.
- Alignment with industry best practices.
- Complying with relevant regulations and the availability of waivers.

2. Metrics Established to Evaluate Effectiveness of Implemented Safety Mitigations

NYCT assesses the effectiveness of safety risk mitigations and continually refines mitigation strategies based on both quantitative metrics and qualitative measures. The following outlines the assessment processes and measures.

One of the most effective tools NYCT has for evaluating safety risk mitigations is through tracking and monitoring mitigations through Corrective Action Plans (CAPs). NYCT's Office of System Safety (OSS) may request a department to develop a CAP to minimize, control, correct, or eliminate risks and/or hazards identified through audit findings, event investigations, internal reviews, or other observations. The safety risk mitigations in a CAP are required to include a schedule, description of the required actions, and specific staff roles and responsibilities.

Once approved by OSS, CAPs are sent to the State Safety Oversight Agency (SSOA), the New York State (NYS) Public Transportation Safety Board (PTSB), for review and approval. Both NYCT OSS and the PTSB monitor progress on CAPs through completion and for effectiveness. After completion, select CAPs may be identified for additional monitoring by the responsible department through a safety assurance and review process. This additional monitoring may in turn be monitored and/or audited by NYCT OSS and the PTSB.

Further, NYCT measures the effectiveness of certain individual safety risk mitigations as appropriate through follow-up investigations and reporting, examining quantitative performance indicators, and through qualitative assessments conducted within OSS, with other departments, labor partners, and other stakeholders as needed.

Because NYCT often implements a suite of mitigations in tandem, it can be difficult to disentangle and measure the independent impact of individual mitigations or confidently distinguish causation from correlation. For that reason, NYCT also tracks and reports a broad range of system-level safety metrics, including those required for compliance with federal and other regulations, such as:

- Number and Types of Incidents: Through its Safety Risk Reduction Program, NYCT analyzes and monitors trends related to different types of incidents. Data reviewed includes major events, collisions, injuries, assaults on transit workers, pedestrian collisions, vehicular collisions, fatalities, system reliability (e.g., mean distance between failures), and transit worker injuries and fatalities. In evaluating mitigations, NYCT reviews these metrics to the extent a mitigation is intentionally targeted at reducing the overall number or a specific type of incident.
- Safety Performance Targets: NYCT sets safety performance targets based on the measures established in the National Public Transportation Safety Plan (NSP). NYCT, in conjunction with its Joint-Labor Management NYC Transit Safety Committee, has identified performance targets that are appropriate to its operations and environment and are also specific, measurable, attainable, relevant, and time-bound (SMART) as required by the FTA's Public

Transportation Agency Safety Program and NSP. NYCT monitors these measures and evaluates performance in relation to the targets throughout the year.

- **Inspection and Audit Reports:** Inspections and audits are used to assess compliance and effectiveness of proactive hazard identification and implemented mitigations, as well as ongoing interventions and control measures. For example, audits and inspections can examine rule compliance, personal protective equipment compliance, and administrative compliance (e.g., supervisors have proper forms, bulletins, and checklists on site and have conducted required pre-job meetings).
- **Safety Training Completion:** NYCT tracks completion rates for required training.
- **Safety Observations:** NYCT tracks and assesses the actions taken in response to safety observations noted during joint labor/management walk-throughs, comments and suggestions submitted by employees (e.g., hotline calls), and Safety Training Observation Program (STOP) cards that highlight areas where trends are identified and proactive interventions are needed.
- **Near-Miss Reviews:** NYCT analyzes near-miss data to identify underlying issues and inform preventative measures.
- **Conversations with Employees and Labor Partners:** Management meets with workforce and labor partners in a variety of venues to discuss mitigations, review safety trends, and solicit feedback to improve and refine the efficacy of safety strategies. This includes Toolbox Talks, which are conducted at each job site with the on-site crew prior to the work commencing, as well as quarterly meetings with the plurality union (TWU Local 100) at the Joint-Labor Management NYC Transit Safety Committee. These conversations offer valuable input from the workforce and a qualitative assessment of how mitigations are working in practice.
- **Safety Metrics on MTA's Website:** NYCT also tracks and reports on a range of safety metrics available on the MTA data dashboard, including [Subway Safety](#), [Major Incidents](#), and [Bus Safety metrics](#). This includes normalized data, as well as incident counts, and provides a holistic overview of safety trends across the system.

Examples of Metrics Specific to Certain Mitigations. Metrics to evaluate the efficacy of mitigations vary and are sometimes unique to the mitigation. Often, quantitative data is supplemented by qualitative assessment based on conversation with the workforce and/or other partners. The following are examples of specific mitigations and the metrics NYCT tracks to monitor and evaluate progress.

- **Platform Edge Barriers:** NYCT is tracking the installations according to relative cost, count of stations, platform length coverage, location on platform, incidents, and customer perception. In recent customer surveys, a majority of respondents stated that the barriers make them feel safer and will protect against falls onto the tracks, and that they want the barriers installed at more stations. NYCT is committed not only to the safety of the system, but also to the feeling of safety in our system for our riders, and surveys are a useful tool that have helped NYCT to refine the design and deployment of these barriers. Additionally,

the platform barriers are built and installed using in-house NYCT labor with in-house machinery in a NYCT facility, resulting in lower costs and a faster installation timeline than use of third party. The barriers also offer some protection for conductors against assaults by separating customers on the platform from the operating position at the platform edge.

- **Track Intrusion Mitigations:** NYCT tracks the total count of intrusions, types of intrusions, impacts to service and length of train delays, locations of intrusions, and injuries or impacts to the trespassers. NYCT is also piloting and exploring track intrusion detection technology, efficacy of which is being tested. These metrics assist the MTA in assessing the efficacy of the various interventions by comparing results across locations where mitigations have or have not been implemented.
- **De-escalation Training:** MTA tracks the percentage completion of the training for the worker population and also qualitatively reviews effectiveness of the training in partnership with labor. Since the March 30 letter, the updated training count is as follows:

Job Title	Count of Workers	Population Trained (%)	Change Since March 30 (percentage points)
Station Agent	2,378	2,378 (100%)	-
Conductor	3,562	1,280 (36%)	+9pp
Train Operator	3,862	1,291 (33%)	+9pp
Station Cleaner	2,029	367 (18%)	+6pp

3. Camera Performance

NYCT has over 100,000 cameras throughout the system, including on platforms, in subway cars and buses, in stations, and at yards and facilities. NYCT cameras are 98% to 99% operational on average. All cameras owned and operated by NYCT are part of a defined preventative maintenance and inspection program to ensure they are functioning as intended. In the event defects are identified with a particular camera, a corrective action plan is established and monitored until the defect is resolved. The cameras that can be viewed remotely are checked for visibility, proper alignment, and lens focus. Regular inspections and maintenance of deployable cameras look at camera system components, power supply, station environment, and electrical components.

4. Video Retention

NYCT cameras retain video for 30 days. NYCT Department of Security's fixed cameras, which are more permanent fixtures included as part of capital projects, retain video for 30 days. NYCT Department of Security's deployable cameras, which are small, easily moved, and can be affixed in areas with access to power, retain video for 14 days.

NYCT has established processes for capturing and saving available video to aid internal and external investigations, including police and safety investigations, to respond to subpoenas,

and to prosecute and defend legal actions involving NYCT. The retention periods for videos captured in this way varies depending on the nature and duration of the investigation or litigation and applicable court rules or orders.

Video retention and sharing offers tremendous value for the NYPD and District Attorneys when pursuing and prosecuting individuals that commit crimes in the NYCT system.

5. Rolling Stock Design to Prevent Access to the Outside of Subway Cars

NYCT currently has 20 open-gangway cars in service and is purchasing an additional 80 cars. As you note, these cars provide fewer access points from the inside of the train to the outside of the subway car. A ten-car train made up of two five-car open-gangway cars has just one potential access point in the body of the train, although it remains possible to access the outside or top of the train from the platform or from the end of the train.

The NYCT subway system is made up of the A Division (numbered lines) and the B Division (lettered lines). B Division cars, including the open-gangway cars, are longer and wider than subway cars on the A Division, which has narrower tunnel segments, tighter curves, and tighter platform clearances than the B Division. NYCT is currently evaluating the feasibility of operating open-gangway cars on the A Division.

However, given the long lead time for subway car procurement and delivery, NYCT is piloting several near-term measures that physically deter access to the outside of subway cars from the interior and exterior of the car. These measures can be implemented more quickly and are significantly less costly than open gangway cars, which are approximately 30% more expensive than five standard subway cars, and these measures can also help deter unsafe access from outside the train.

NYCT also is leading a broad range of education and enforcement initiatives:

- Deployment of additional NYPD officers and innovative use of drones for monitoring high-risk stations.
- Student-led awareness campaign ("Ride Inside, Stay Alive"), including student-recorded announcements in the subway system, social media outreach, and stakeholder presentations, as well as announcements from celebrities.
- Ongoing development and roll-out of educational materials and videos featuring personal testimonials.
- Focus groups of young people to understand motivations of youth who ride outside of the subway cars and partnership with high school students to review safety campaigns
- Launch of interagency taskforce, including MTA, NYC Public Schools, NYPD, and NYC Department of Youth & Community Development to tackle "subway surfing" through education and enforcement.

II. Clarifications Regarding Data Analysis Provided in March 30 Response

The MTA's March 30 response included a wide range of data and analyses, with sources footnoted, included in the Exhibits, and/or linked. The following provides additional information on the sources, calculations, and normalization or time period covered, based on the latest data available for each source, along with the regulatory and/or legal definitions referenced in the prior response.

1. Crime Data

Major crimes in U.S. Cities. For the national comparison of major crimes per capita (per 1,000 residents) for the largest U.S. cities discussed on page 9 of the March 30 response, crime data was sourced from the FBI Crime Data Explorer and linked to in (see footnote 8 at the bottom of that page (relinked here for convenience: [Crime in the United States Annual Report 2023](#)). Using the data in the table *Offenses Known to Law Enforcement by State by City Table 8*, the analysis divides the column titled "Total Crimes" by "Population," which is divided by 1,000, to normalize reported crime for cities across the United States. This table is used for consistency with NYPD reporting of crime in the NYCT system, which covers Part I crimes, also known as index crimes. 2023 is the latest available annual data published by the FBI.

Crimes in the NYCT System. As noted earlier in this response and in the March 30 letter, the NYPD is the agency responsible for policing – as well as officially reporting on – crime in the NYCT system. The March 30 response indicates on page 10 that NYPD reports on major felonies in the NYCT system for six of the seven index crimes (it does not include Larceny-Grand Theft Auto). These data are reported monthly by the NYPD [at the NYCT Committee and posted on our Committee page website](#), as well as on [the MTA Metrics dashboard](#), on [the NYS OpenData portal](#), and by NYPD on its [CompStat dashboard](#). Backup data for NYPD transit crime statistics reported in the March 30 response were included in Exhibit A (pages 18-20), with links to original source data from NYPD and NYPD's [CompStat 2.0](#) dashboard in Exhibit B (page 22). Major crimes per day are normalized by dividing the total annual NYPD-reported felony crimes by total days in the reported year. As noted in the March 30 letter, the earliest comparable data available covers 1997, the first year for consistent reporting of the six index crimes in the NYCT system.

2. National Comparisons

For comparability across the U.S., the March 30 response uses NTD datasets, as follows:

Customer Assaults (FTA NTD). To calculate customer assaults, as cited in footnote 13 on page 10 in the March 30 response, the MTA used the NTD database Safety & Security (S&S) "[Major Safety Events](#)." Major Safety Events data for all of 2024 was filtered by Event Type to reflect assaults on customers/passengers by including only "Assaults" and "Assaults not against Transit Worker" events and then aggregated by transit agency. Total NYCT events included both New York City Transit and MTA Bus events, which are reported as separate agencies in the NTD.

Transit Worker Assaults (FTA NTD). To calculate and compare assaults on transit workers across transit agencies as referenced on page 6 on the March 30 letter, the MTA used the same database indicated above, NTD Safety & Security (S&S) “[Major Safety Events](#).” Major Safety Events data for all of 2024 was filtered by Event Type to include only “Physical Assault on an Operator” and “Physical Assaults on Other Transit Worker” and then aggregated by transit agency. Total NYCT events included both New York City Transit and MTA Bus events, which are reported as separate agencies in the NTD.

Unlinked Passenger Trips (FTA NTD). To calculate total Unlinked Passenger Trips (UPT), the MTA used data from NTD’s [2023 Annual Database Federal Funding Allocation](#), as referenced in footnote 13 on page 10 of the March 30 response. This represents the latest available annual dataset with consistently reported ridership across U.S. public transit systems. UPT data was filtered to exclude “Commuter Rail” and “Hybrid Rail” transit modes and then aggregated by transit agency. Annual UPT figures were divided by one million to establish a per capita rate.

Normalization for Benchmarking. Because the NYCT system carries significantly more riders than other national public transit systems, customer assault totals must be normalized to make meaningful comparisons between systems that mirror the customer experience. Using the Major Security Events dataset from NTD’s 2023 Annual Database Federal Funding Allocation, the MTA divided each agency’s customer assault total by the unlinked passenger trip total (divided by one million). The result presents annual average rates using the most recently available data published by FTA. Similarly, to benchmark transit worker assaults with other national operating agencies, as referenced on page 6 of the March 30 letter, the MTA used “Vehicle Revenue Miles” to normalize NYCT worker incidents relative to the scope of total service operations.

3. Transit Worker Assaults

All NYCT “Security Incidents” are required by the agency’s official policy instruction to be entered into the NYCT Security Incident Tracking System (SITS) database. Workplace violence is a type of security incident, and the term “workplace violence” is used intentionally to capture all acts of aggression against NYCT employees. Official statistics on workplace violence are derived from one source – the NYCT SITS database – and are reported monthly on the [MTA Metrics Dashboard](#) dating back to January 2019.

As part of a quality assurance check, NYCT regularly liaises with the NYPD Transit Bureau Crime Analysis Section to reconcile any disparities in documented workplace violence incidents involving NYCT Subways personnel. A similar process involving the NYPD Patrol Services Bureau is in place for NYCT Bus and MTA Bus personnel.

Workplace violence incidents are classified as legal/criminal offenses (violations, misdemeanors, or felonies) as applicable, according to the NYS Penal Law. The MTA also tracks and reports workplace violence incidents pursuant to NYS Labor Law Section 27-B. The FTA and NTD maintain definitions that differ from those used by the NYS Penal Law and NYS Labor Law. As a result, data reflected in the NTD will not match other data reported by the MTA. The MTA’s

datasets for workplace violence incidents are available on the NYS OpenData site, were included in Exhibit B of the March 30 response, and are linked here for convenience: [Labor Law Incidents](#) and [Penal Law Incidents](#). These data can be downloaded and sorted by agency and type of workplace violence incident.

III. Additional Detail on Federal Funding and Investments in Safety and Security

1. Safety Investment

MTA's March 30 letter included the totality of funds – federal and local – expended in 2024 on safety-related projects eligible under section 5307³. Table 1 below lists the \$142 million in expenditures by project and lists the grants for federally-funded projects.

MTA's FFY 2024 5307 grant (NY-2024-056) totaled \$1,100,760,763, making the safety set-aside \$8,255,706. The MTA identified Rail Equipment to satisfy the requirement. This project has a budget of \$925,950,644, all of which has been drawn down. The grant and set-aside amounts above and detailed in Table 1 include funds from prior years that were included in the FFY 2024 grant. These numbers are higher than those provided in the March 30 response, which identified only the FFY 2024 funds.

In addition, MTA continues its aggressive state-of-good repair program aimed at ensuring safe, reliable operations. As examples, these investments include repair of deficient conditions in stations and structural defects as well as signal modernization, power upgrades, and track replacement.

2. Security Investment

The \$371 million in 2024 security expenditures cited in the March 30 letter is enumerated in Table 2 below. This list includes both federal and local spending, with grant numbers included where applicable. Security expenditures include the installation of security components, such as cameras and customer intercoms, as part of much larger project scopes (e.g., station accessibility improvements, rolling stock purchases). The dollar amount shown is the cost of the security components only.

IV. Timeliness of FTA Reporting

NYCT is committed to federal regulatory compliance, including reporting of major safety and security events to the FTA NTD. The assertion of late submittals was a surprise, and, as recommended in your letter, the MTA contacted its NTD validation analyst, who also was not aware of a timeliness issue. The NTD validation analyst determined that the submission date listed in the database reflects ***the last date an event record was accessed and/or modified, rather than the date it was originally submitted. With this information, we were able to replicate the calculations in your letter.*** Your calculation, however, does not capture the full story as event

³ 49 U.S.C. §5329(d)(4)(B)

records are often modified following the original submittal as more detail becomes available through the post-event investigation (e.g., cost estimate data). Additionally, FTA may request modifications or revisions to records following the original submission.

The date of original submission is not presented in the database or normally made available by the FTA NTD for NYCT to review. At the recommendation of the validation analyst, the MTA has submitted a formal request to obtain the original submission dates for 2024 NTD filings of major incidents to identify any current timeliness issues.

In any event, following conversations with our NTD validation analyst in 2024, NYCT took steps to modify internal reporting processes and improve timeliness, such as by developing order-of-magnitude cost estimates that can be applied to different types of major incidents until final estimates become available. NYCT appreciates the positive working relationship and support from the NTD validation analyst in submitting and modifying as needed records of major safety and security incidents to the NTD.

Table 1: Safety - 2024 Expenses

Grant	Amount	Project Description
NY-44-X016	\$1,522,384	Upgrade Emergency Booth Communication System
NY-90-X738	\$1,937,240	Upgrade Bus Radio System - MTA Bus Company
NY-2016-029-01	\$5,941,777	Upgrade Bus Radio System - MTA Bus Company
NY-2017-045-01	\$5,376,554	Upgrade Bus Radio System - New York City Transit
NY-2018-071-13	\$1,281,483	Upgrade Forsyth Street Fan Plant
NY-2019-066-12	\$8,789,125	Construct Back-up Power Control Center
NY-2020-077-11	\$378,486	Fan Plant Fiber Optic Cable Repairs: 8 Avenue Line
NY-2021-016-12	\$6,233,922	Tunnel Lighting Upgrade: 50 St to 7 Av / 8 Avenue Line
NY-2021-045-11	\$6,131,179	Fan Plant Supervisory Control And Data Acquisition (SCADA) Upgrade
NY-2021-061-01	\$4,611,039	Rehabilitate Emergency Exit at 168 St / Broadway-7 Avenue Line
Subtotal - Federal Expenses	\$42,203,191	
N/A	\$99,859,360	Various locally funded capital projects, such as projects for the rehabilitation/upgrade of fire alarms, sprinklers, station emergency lighting, station customer communications, radio systems, and emergency exits
Total Safety Expenses	\$142,062,552	

Table 2: Security - 2024 Expenses

Grant	Amount	Project Description
FE2020-RA-00005 (TSGP)	\$97,830	Design of Electronic Security System: Canal St Station Complex
FE2021-RA-00004 (TSGP)	\$694,271	Design of Electronic Security System: Jay St - MetroTech Station Complex
FE2022-RA-00006 (TSGP)	\$803,675	Design of Electronic Security System: 145 St Station / 8 Avenue Line
FE2022-RA-00006 (TSGP)	\$685,010	Design of Electronic Security System: 14 St-8 Av Station Complex
NY-2017-044-09	\$454,098 *	ADA Station Accessibility: 68 St-Hunter College / Lexington Line
NY-2018-059-01	\$123,393 *	Purchase 75 Passenger Railcars for the Staten Island Railway
NY-2018-059-01	\$649,069 *	Purchase 440 Passenger Railcars for the B-Division Subway Lines
NY-2018-060-01	\$4,212,701 *	Purchase 440 Passenger Railcars for the B-Division Subway Lines
NY-2018-060-01	\$245,732 *	Purchase 20 Passenger Railcars (Open Gangway Prototype) for B-Division Subway Lines
NY-2018-060-02	\$202,924 *	Purchase 440 Passenger Railcars for the B-Division Subway Lines
NY-2019-052-01	\$362,711 *	ADA Station Accessibility: 68 St-Hunter College / Lexington Line
NY-2019-056-02	\$9,408 *	Purchase 25 Standard Buses
NY-2019-065-09	\$96,778 *	ADA Station Accessibility: Woodhaven Boulevard / Jamaica Line
NY-2020-066-01	\$25,011 *	Purchase 25 Standard Buses
NY-2020-066-01	\$67,480 *	Purchase 85 Standard Buses
NY-2020-073-02	\$37,265 *	ADA Station Accessibility: Beach 67 St / Far Rockaway Line
NY-2020-073-03	\$22,926 *	ADA Station Accessibility: New Dorp / Staten Island Railway
NY-2020-073-04	\$20,910 *	ADA Station Accessibility: Grand St / Canarsie Line
NY-2020-073-05	\$46,986 *	ADA Station Accessibility: Lorimer St / Canarsie Line
NY-2020-073-06	\$54,628 *	ADA Station Accessibility: Metropolitan Ave / Crosstown Line
NY-2020-073-07	\$11,438 *	ADA Station Accessibility: Dyckman Street (northbound) / Broadway-7 Avenue Line
NY-2020-073-08	\$27,655 *	ADA Station Accessibility: East 149 St / Pelham Line
NY-2020-073-09	\$66,686 *	ADA Station Accessibility: 7 Av / 6 Avenue Line
NY-2020-073-10	\$2,179 *	ADA Station Accessibility: 68 St-Hunter College / Lexington Line

Table 2 (Continued): Security - 2024 Expenses

Grant	Amount	Project Description
NY-2020-073-11	\$150,885 *	ADA Station Accessibility: 14 St / 6 Avenue Line
NY-2020-073-12	\$154,023 *	ADA Station Accessibility: 6 Av / Canarsie Line
NY-2020-073-13	\$205,471 *	ADA Station Accessibility: 14 St / Broadway-7 Avenue Line
NY-2020-074-01	\$275,125 *	ADA Station Accessibility: 95 St / 4 Avenue Line
NY-2021-018-06	\$40,206 *	ADA Station Accessibility: 68 St-Hunter College / Lexington Line
NY-2021-036-01	\$465,737 *	Purchase 45 Standard Battery Electric Buses
NY-2021-038-01	\$343,813 *	Purchase 85 Standard Buses
NY-2021-043-03	\$404,087 *	ADA Station Accessibility: Westchester Square / Pelham Line
NY-2021-043-04	\$30,511 *	ADA Station Accessibility: Court Square / Crosstown Line
NY-2021-043-05	\$570,878 *	ADA Station Accessibility: Queensboro Plaza / Flushing Line
NY-2021-046-01	\$34,939 *	ADA Station Accessibility: Woodhaven Boulevard / Jamaica Line
NY-2021-054-01	\$115,318 *	ADA Station Accessibility: 181 St / 8 Avenue Line
NY-2021-055-01	\$69,364 *	ADA Station Accessibility: Woodhaven Boulevard / Jamaica Line
NY-2021-064-03	\$187,585 *	ADA Station Accessibility: 86 St / Lexington Line
NY-2021-065-01	\$225,615 *	ADA Station Accessibility: Borough Hall / Lexington Line
NY-2021-065-02	\$235,026 *	ADA Station Accessibility: 36 St / 4 Avenue Line
NY-2022-012-08	\$155,361 *	ADA Station Accessibility: 96 St / 8 Avenue Line
NY-2022-014-01	\$58,989 *	Purchase 640 Passenger Railcars for the B-Division Subway Lines
NY-2022-048-08	\$265,668 *	ADA Station Accessibility: Classon Av / Crosstown Line
NY-2022-053-01	\$113,378 *	Purchase 15 Standard Battery Electric Buses
NY-2022-053-06	\$1,083 *	Purchase 15 Standard Battery Electric Buses
NY-2022-064-01	\$183,670 *	ADA Station Accessibility: 137 St / Broadway-7 Avenue Line
NY-2022-064-04	\$308,191 *	ADA Station Accessibility: Northern Boulevard / Queens Boulevard Line
NY-2023-071-01	\$8,215 *	Purchase 640 Passenger Railcars for the B-Division Subway Lines
NY-2023-080-01	\$409,777 *	ADA Station Accessibility: Parkchester-E.177 St / Pelham Line

Table 2 (Continued): Security - 2024 Expenses

Grant	Amount	Project Description
NY-2023-101-01	\$157,209 *	ADA Station Accessibility: Parkchester-E.177 St / Pelham Line
NY-2023-101-02	\$82,265 *	ADA Station Accessibility: Huguenot / Staten Island Railway
NY-2023-101-03	\$151,438 *	ADA Station Accessibility: New Lots Av / New Lots Line
NY-2023-101-04	\$172,812 *	ADA Station Accessibility: 46 St-Bliss Street / Flushing Line
NY-2023-101-05	\$184,037 *	ADA Station Accessibility: 33 St-Rawson St / Flushing Line
NY-2023-101-07	\$83,282 *	ADA Station Accessibility: Harlem-148 St / Lenox Avenue Line
Subtotal - Federal Expenses	\$14,864,718	
N/A	\$356,424,366	Various locally funded capital projects, such as projects for the rehabilitation/upgrade of yard fencing/lighting, station security cameras, and security systems in under-river tubes; as well as locally funded operating programs to enhance security and combat fare evasion
Total Security Expenses	\$371,289,085	

* These projects include the installation of security components, such as cameras and customer intercoms, as part of a larger project scope. The dollar amount shown is the cost of the security components only.